

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

EPSILON ENERGY USA,
INC.,

Plaintiff,

v.

CHESAPEAKE APPALACHIA, LLC,

Defendant.

Civil Action No.

Judge

MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Plaintiff Epsilon Energy USA, Inc. (“Epsilon”), by and through its undersigned counsel, respectfully moves this Court for leave to file under seal portions of its Complaint against Defendant Chesapeake Appalachia, LLC (“CHK”), certain exhibits attached thereto, and its Memorandum in Support of Motion for Preliminary Injunction (“Injunction Motion”). In support of this motion, Epsilon refers the Court to its Memorandum in Support, filed contemporaneously herewith.

WHEREFORE, for the reasons stated in the accompanying Memorandum in Support of Motion for Leave to File Documents Under Seal, Epsilon respectfully requests this Court enter an Order granting it leave to file the Settlement Agreement, the Purchase and Sale Agreement, and certain portions of its Complaint and Memorandum in Support of Motion for Preliminary Injunction under seal.

Dated: March 9, 2021

Respectfully submitted,

/s/ Gregory J. Krock

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*Counsel for Plaintiff Epsilon Energy USA,
Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **Motion for Leave to File Documents Under Seal** has been served on served upon the following by mail, this 9th day of March 2021:

Corporate Representative
Chesapeake Appalachia, LLC
c/o The Corporation Company
1833 S. Morgan Road
Oklahoma City, OK 73128

/s/ Gregory J. Krock
Gregory J. Krock